

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

HILLTOP CHURCH OF THE
NAZARENE,

Plaintiff,

V.

CHURCH MUTUAL INSURANCE
COMPANY,

Defendant.

CIVIL ACTION NO. 6:21-CV-00322-JCB

JOINT NOTICE OF AGREED EXTENSION OF DISCOVERY DEADLINE

Plaintiff Hilltop Church of the Nazarene and Defendant Church Mutual Insurance Company jointly file this Joint Notice of Agreed Extension of Discovery Deadline to advise the Court of the parties' stipulation to extend the discovery deadline through and until July 29, 2022.

The Court’s October 13, 2021 Scheduling Order provides for a May 13, 2022 discovery deadline. [Dkt. 8] The Order further states that “[t]he parties may agree to extend this discovery deadline, provided that (1) the extension does not affect the trial setting, dispositive-motions deadline, challenges to experts deadline, or pretrial submission dates; and (2) the parties joint file with the court written notice of the extension.”

Due to various scheduling issues, the parties previously agreed to extend the discovery deadline through and until June 13, 2022. [Dkt. 23] To accommodate additional scheduling complications, the parties agreed on a discovery deadline through and until July 15, 2022. [Dkt. 26] Since that agreement, additional scheduling issues arose and counsel for the parties have agreed to extend the discovery deadline again, through and until Friday, July 29, 2022. The agreed extension leaves the parties with more than sufficient time to evaluate and draft dispositive and/or

Daubert motions prior to the August 8, 2022 deadline for such motions and will accordingly not affect that deadline. The extension will also not affect the November 14, 2022 trial setting.

Respectfully submitted,

By: /s/ Vincent P. Circelli
Preston J. Dugas III
State Bar No. 24050189
pdugas@dcclawfirm.com
Vincent P. Circelli
State Bar No. 24058804
vcircelli@dcclawfirm.com
**DUGAS, CHEEK & CIRCELLI,
PLLC**
1701 River Run, Suite 703
Fort Worth, TX 76107
Telephone: 817-945-3061
Facsimile: 682-219-0761

ATTORNEYS FOR PLAINTIFF

-and-

By: /s/ Lindsey P. Bruning
G. Brian Odom
State Bar No. 50511840
bodom@zellelaw.com
Lindsey P. Bruning
State Bar No. 24064967
lbruning@zellelaw.com
Kiri D. Deonarine
State Bar No. 24105298
kdeonarine@zellelaw.com
ZELLE LLP
901 Main Street, Suite 4000
Dallas, TX 75202-3975
Telephone: 214-742-3000
Facsimile: 214-760-8994

**ATTORNEYS FOR DEFENDANT
CHURCH MUTUAL INSURANCE
COMPANY**

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing has been served on the following counsel of record in accordance with FEDERAL RULES OF CIVIL PROCEDURE on this 14th of July 2022:

Preston J. Dugas III
State Bar No. 24050189
pdugas@dcclawfirm.com
Vincent P. Circelli
State Bar No. 24058804
vcircelli@dcclawfirm.com
DUGAS, CHEEK & CIRCELLI, PLLC
1701 River Run, Suite 703
Fort Worth, TX 76107
Telephone: 817-945-3061
Facsimile: 682-219-0761

ATTORNEYS FOR PLAINTIFF

/s/ Lindsey P. Bruning

Lindsey P. Bruning